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CHRIS PRINCIPE

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

CHRIS PRINCIPE,  
Plaintiff,

v.

TIMOTHY GLEN CURRY A/K/A  
TIMOTHY TAYSHUN,  
Defendant.

) Case No. 8:17-cv-00608 JLS (KESx)

) **THIRD STIPULATION TO EXTEND  
DEADLINE TO FILE DISMISSAL  
WITH PREJUDICE**

1 Plaintiff Chris Principe and Defendant Timothy Glen Curry, by and through their  
2 respective counsel, stipulate to extend the deadline for the parties to file a stipulation to  
3 dismiss this action with prejudice by approximately 30 days from July 6, 2018 to  
4 August 6, 2018. This stipulation is based on the following facts:

5 1. On March 30, 2018, the parties engaged in a mediation in an attempt to  
6 resolve this dispute. The parties reached a settlement in principal and filed a notice of  
7 settlement shortly thereafter.

8 2. On April 9, 2018, in response to the parties' notice of settlement, the Court  
9 issued an Order Staying the Action Pending Final Settlement, Removing Case from  
10 Active Caseload, and Filing of Dismissal, Dkt. 48 (the "Order"). The Order provided the  
11 parties until May 7, 2018 to file a stipulation to dismiss the case. The Order further stated  
12 that if a stipulation was not filed by that date, the action would be dismissed.

13 3. The parties have worked together to draft a long-form settlement agreement  
14 memorializing the terms of their settlement in principal. Significant progress has been  
15 made, and a draft has been circulated among the parties.

16 4. Because the parties needed additional time to negotiate the written  
17 settlement agreement, the parties filed on April 30, 2018 a stipulation requesting that the  
18 Court extend the May 7, 2018 deadline set in the Order by 30 days to June 6, 2018.  
19 Dkt. 49. On May 3, 2018, the Court granted this stipulation and issued an order extending  
20 the deadline for the parties to file a dismissal in this action up to and including  
21 June 6, 2018. Dkt. 50.

22 5. Although the parties had continued their efforts in good faith to finalize the  
23 draft settlement, several circumstances arose that warranted additional time for the parties  
24 to finalize the agreement and file a stipulation to dismiss this action.

25 6. First, Daniel A. De Soto, counsel for Defendant, had been engaged in a trial  
26 that ended on May 18, 2018. Defendant had also been traveling, which combined with  
27 Mr. De Soto's trial schedule, necessitated additional time for Defendant and his counsel  
28

1 to discuss the most recent draft of the settlement agreement and prepare proposed  
2 revisions.

3 7. Steven E. Lauridsen, counsel for Plaintiff who is in charge of negotiating the  
4 agreement on behalf of Plaintiff, had an obligation out of the country beginning  
5 May 26, 2018 and with him returning on June 5, 2018. Moreover, because Plaintiff  
6 frequently travels internationally as part of his business activities, the parties wanted to  
7 ensure that there is sufficient time for Mr. Lauridsen to review and discuss with Plaintiff  
8 any proposed revisions forthcoming from Defendant. This is particularly true given the  
9 time zone differences that were involved during this period.

10 8. The parties therefore filed on May 25, 2018 a second stipulation requesting  
11 that the Court extend the June 6, 2018 deadline set in the Order by 30 days to July 6,  
12 2018. Dkt. 51. On May 29, 2018, the Court granted this stipulation and issued an order  
13 extending the deadline for the parties to file a dismissal in this action up to and including  
14 July 6, 2018. Dkt. 52.

15 9. The parties have continued to negotiate in good faith in an effort to finalize  
16 the written long-form agreement, and Defense counsel has informed Plaintiff's counsel  
17 that he believes that negotiations are nearly complete, subject to a couple minor proposed  
18 revisions and absent any disagreement on how to resolve those issues.

19 10. However, because the extended deadline to file a dismissal will arrive soon,  
20 the parties believe that they require an additional 30 days to finalize the terms of this  
21 written agreement in an orderly fashion. The parties expect that this will be the final  
22 extension they require.

23 11. This is the third request for an extension of the May 7, 2018 deadline. The  
24 first request was granted and extended the deadline to June 6, 2018. The second request  
25 was granted and extended the deadline to July 6, 2018. The parties request this extension  
26 for the above reasons to allow them to finalize settlement in an orderly fashion and not  
27 for the purpose of delay.  
28

Based on the foregoing, the parties respectfully request that the Court enter an order granting this stipulation and allowing the parties until August 6, 2018 to file a stipulation to dismiss with prejudice.

**SO STIPULATED:**

DATED: June 28, 2018

Tucker Ellis LLP

By: /s/Steven E. Lauridsen

Howard A. Kroll  
Steven E. Lauridsen  
Attorneys for Plaintiff  
CHRIS PRINCIPE

DATED: June 28, 2018

Law Office of Daniel A. De Soto

By: /s/Daniel A. DeSoto\*

Daniel A. De Soto  
Attorneys for Defendant  
TIMOTHY GLEN CURRY

\*Pursuant to Local Rule 5-4.3.4(a)(2), the filing party attests that Defendant's counsel concurs in the content of this stipulation and has authorized its filing with his electronic signature.